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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA

Plaintiff,

v.

BRUCE DIANGELO DICKSON

Defendant

Magistrate Case No.

11 MJ 0539

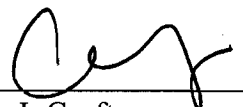
COMPLAINT FOR VIOLATION

Title 18, U.S.C. §2422(b)-
Attempted Enticement of Minor

The undersigned Complainant, being duly sworn, states:

From on or about February 2, 2011 to February 11, 2011, within the Southern District of California, and elsewhere, the defendant BRUCE DIANGELO DICKSON using any facility and means of interstate and foreign commerce, including the mail, telephone and by computer, did knowingly attempt to persuade, induce, entice, and coerce, an individual whom he believed was a minor female to engage in prostitution and unlawful sexual activity for which a person could be charged with a criminal offense; in violation of Title 18, United States Code, Section 2422(b).

And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Carla J. Croft
Special Agent, FBI

Sworn to me and subscribed in my presence this 11th day of February, 2011.


UNITED STATES MAGISTRATE JUDGE

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STATEMENT OF FACTS

On February 2, 2011, BRUCE DIANGELO DICKSON, also known as "Brucie B", Federal Bureau of Investigation (FBI) Confidential Human Source (CHS) #S-00033952 initiated contact with DICKSON, via a MySpace account (Friend ID# 37697372 listed under alias "Brucie b"), by sending him a "friend request." The CHS used a MySpace account which is based on a fictitious person that the Oceanside Police Department, Immigration and Customs Enforcement (ICE) and the FBI are using to gather information on pimping and gang related investigations. The profile picture for that account depicts a young looking female with the age of 16 listed in the profile. Defendant accepted the "friend request" and began to chat online. During the course of their Internet messaging, which occurred between February 2-9, 2011, DICKSON solicited the CHS to meet him for sex and to work as a prostitute. CHS was directed to pose as a juvenile who indicated fictitiously that she was a minor. CHS did not tell DICKSON that she was or ever had been a prostitute. CHS did tell DICKSON that she had not previously had sex.

At approximately 9:48 PM on February 2, 2011, CHS received a MySpace instant message from DICKSON via his MySpace account saying "HELLO." He also sent "glad you are here now lets talk." DICKSON then sent "as you can see by my page I get down in the game like whats his name so tell me a lil about yourself." Based on my training, having attended conferences on the subject of pimping and prostitution, and experience investigating these types of crimes, the term "the game" refers to pimping and prostitution. CHS responded by saying "hmmm...my name is Sarah...i live in oside...what about youuuu???" To which DICKSON responded "I am brucie b/Thizz I live in the bay I am an promoter/manager." DICKSON then asked CHS if she knew what an escort was and how old she was.

CHS stated that she was 17. CHS also asked what kind of an escort he was talking about. DICKSON responded "the kind dat goes on dates for \$\$\$ when will yo ube 18." CHS replied that she would turn 18 in June. DICKSON then asked where CHS lived and "do you want to be my escort." CHS said "I live down in San Diego!!!" and asked DICKSON how that would work. DICKSON replied "you would come live with me and get this money." DICKSON then referred CHS to other girls on his page and told her that "they get down for" him. CHS replied that she had seen the other

1 girls. DICKSON told CHS that he "will be your Mr. everything and you will be my Miss.
2 Everything." He then asked "do you like girls also." CHS responded "I haven't messed around with
3 girls yet." CHS asked DICKSON what he expected and he replied "WHAT I EXPECT IS FOR YOU
4 TO GET MONEY AND FOLLOW ALL MY INSTRUCTIONS AND BE MY BITCH CAN YOU
5 DO THAT." Based on my training and experience pimps often refer to prostitutes as "bitches." CHS
6 told DICKSON "Yea I think I could do that 4 u what else do u want?" DICKSON added "SELLING
7 PUSSY AND ENJOYING LIFE TO THE FULLEST A PARTY EVERYDAY." CHS told
8 DICKSON that she did not know anyone who would want to buy her and he told CHS that he had that
9 all under control "BELIEVE ME THERE ARE MANY DIFFERENT SITES THAT I USE AND
10 YOU WILL BE FINEALL YOU HAVE TO DO IS MAKE THEM HAPPYAND WE PAID." Based
11 on my training and experience, pimps use various websites to advertise prostitutes. CHS asked
12 DICKSON if she would get any money and told him she had never done that before. DICKSON
13 asked if she had talked to "ANY OF MY BITCHES LIKE DADDYLILBITCH I KNOW IT WILL
14 BE FINE JUST TRUST AND BELIEVE IN DADDY AND YOU WILL BE FINE." Based on my
15 training and experience I know that pimps often refer to themselves as "Daddy" and are also often
16 referred to as "Daddy" by their prostitutes. CHS asked "wat is my name if they have names?"
17 DICKSON replied "WHAT DO YOU LIKE AND I LIKE TO BE CALLED DADDY." CHS
18 confirmed that DICKSON wanted her to call him "daddy" and then asked again what he wanted to
19 call her. DICKSON told CHS that "lilbitch's" real name was also Sarah. CHS commented on the
20 fact that her name was the same name as one of DICKSON's other prostitutes. DICKSON then
21 commanded CHS saying "YES BITCH NOW SAY IT." CHS responed "yes daddy." DICKSON
22 replied "VERY GOOD YOU KNOW WHO I AM NOW CORRECT BITCH."

23 DICKSON continued to give orders to CHS including getting a Yahoo! account because "WE
24 ALL TALK ON THERE THOSE 3 BITCHES." DICKSON asked "WHAT NAME DO YOU LIKE
25 BITCH." CHS said she would get Yahoo! and told him to tell her "what name since ur daddy."
26 DICKSON stated "YES BITCH I AM AND I WILL THINK OF ONE IN A MIN OK." He then
27 asked for her to "TELL ME WHY YOU WANT TO BE MY BITCH." CHS replied "because you
28 want me daddy." DICKSON continued saying "YES BITCH I DO BUT WHY DO YOU WANT TO
SELL PUSSY FOR ME BITCH AE YOU THE COPS ???" CHS assured him that she was not law
enforcement and offered to send DICKSON a picture. DICKSON provided CHS with the electronic

1 mail account of BRUCIE_B707@YAHOO.COM. DICKSON continued to demand the picture and
2 ordered CHS to "MAKE IT SEXY BITCH." DICKSON then told her to change her MySpace page
3 to "LOOK LIKE THE OTHER BITCHES PAGE." CHS continued to comply saying "ok daddy."
4 DICKSON told CHS to "LOOK AT THERES AND YOU WILLSEE BITCH." CHS again stated
5 "ok daddy." DICKSON replied "VERY GOOD BITCH YOU WILL BE MY HOE AS WELL
6 UNDERSTAND BITCH." "Hoe" is a slang term for prostitute. DICKSON chose the name
7 "DADDYSMARIE" for CHS and showed her how to write it "\$DADDY\$MARIE\$BZ\$." When it
8 was not changed correctly on CHS's MySpace page, DICKSON messaged CHS "BITCH ALMOST
9 BZ IS IN CAPITOLS."

10 DICKSON continued having online chats and telephonic conversations with CHS regarding
11 prostitution from the initial conversation on February 2, 2011 to present. The conversations included
12 sexually explicit demands, the rules of prostitution, instructions on pricing for various sex acts
13 expected for the CHS to complete while working as a prostitute for DICKSON, instructions on how
14 and where to send money acquired during acts of prostitution, information on posting prostitution
15 advertisements and admonishments to not speak to law enforcement about prostitution activities.
16 DICKSON also told CHS that he was going to travel to the San Diego, California to pick her up so
17 she could prostitute for him.

18 On February 5, 2011, DICKSON had a conversation with CHS on Yahoo! Messenger account
19 brucie_b707. In the conversation DICKSON told "you pay me as much as you can considering you
20 have never hoed before and its for my instruction bitch and my protection bitch and everything daddy
21 deos for you bitch." DICKSON then told CHS "it cost \$15 to send money bitch \$10 - \$15." CHS
22 responded "ok daddy i promise you with everything that i will send you money on monday thru
23 western union so you know i am serious daddy." The money requested was believed to be proceeds
24 of child prostitution, earned by the CHS. Also during the February 5, 2011 conversation with CHS
25 on Yahoo! Messenger account brucie_b707 stated that "daddy willcome get you."

26 On February 7, 2011, DICKSON provided the following information to CHS to send money
27 via Western Union on Yahoo! Messenger account brucie_b707: Bruce D. Dickson, 121 Cynthia
28 Street, Vallejo, CA 94589, (707) 631-0445. CHS informed DICKSON that she had made \$100
having oral sex . Later that day CHS sent \$88.00 to Bruce D. Dickson, Vallejo, CA via Western
Union MTCN:8828437633 sent from Ralphs#123 101 G Street, San Diego, CA 92101. The fee for

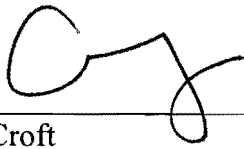
1 sending the \$88.00 was \$12.00. On February 8, 2011, DICKSON confirmed the receipt of that
2 money during a conversation on the same Yahoo! Messenger account with CHS.

3 On the same messenger account on February 8, 2011, DICKSON stated "MAYBE FRIDAY
4 BITCH BUT I AM CUMMING TO GET MY BITCHES 4SHO JUST BE READY BITCH WHATS
5 NEAR YOU BITCH LIKE HOTELS AND SHIIT." DICKSON went on to suggest that CHS take a
6 Greyhound bus to come meet him. CHS stated that she would "rather wait for you to come get me
7 daddy." DICKSON then told CHS "ITS ALL STAR WEEKEND IN LA RIGHT NOW HELLA
8 DOUGH OUT THERE BITCH CALM DOWN BITCH DONT THINK THAT I AM NOT
9 CUMMING TO GET YOU BITCH BECAUSE I AM 4SHO BITCH DADDY LOVES HIS
10 BITCHES." DICKSON continued to give instructions to CHS on how to leave the family she is
11 staying with. DICKSON instructed "OK BITCH TELL THEM YOU HAD FORGOTTEN YOU
12 HAVE TO BE AT SCHOOL ON FRIDAY SO YOU WILL LEAVING EITHER FRIDAY NIGHT
13 OR SATURDAY MORNING BITCH." CHS replied that she did not want to "be here anymore."
14 DICKSON stated that "DADY WILL GET YOU OUT OF THERE."

15 On February 10, 2011, DICKSON told the "minor" (CHS) that he was flying up to Seattle,
16 WA to go to court and then would fly back to the Bay Area and drive down to San Diego on 2/11/11
17 to meet up the "minor" and another girl for prostitution. DICKSON also stated he would post online
18 prostitution ads of the "minor" when he returns from Seattle.

19 On February 11, 2011, CHS sent DICKSON an additional \$100.00 to the same location
20 purportedly from proceeds from prostitution, similar to the one on 2/7/11. DICKSON stated that he
21 was still planning on traveling down to San Diego to meet the "minor" and another girl and stated he
22 would be in San Diego later on February 11, 2011.

23 Based on the above facts, I believe that there is probable cause to believe that BRUCE
24 DIANGELO DICKSON committed the offense of attempted enticement of a minor for prostitution
25 and illegal sex acts in violation of Title 18 U.S.C. §2422(b). I swear under penalty of perjury under
26 the laws under the United States that the foregoing is true and correct to the best of my knowledge.
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Carla Croft
Special Agent, FBI